

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 04-269
v.	:	DATE FILED: February 9, 2005
KABONI SAVAGE,	:	VIOLATIONS:
a/k/a "Yusef Billa,"	:	21 U.S.C. § 846
a/k/a "Joseph Amill,"	:	(conspiracy to manufacture and
a/k/a "Bon," "Bonnie,"	:	distribute cocaine and crack – 1 count)
a/k/a "B,"	:	18 U.S.C. § 1956(h) (conspiracy to
GERALD THOMAS	:	launder monetary instruments – 1 count)
a/k/a "Baha Jabbaar"	:	18 U.S.C. § 1957 (money laundering
a/k/a "Bubbie,"	:	– 1 count)
STEVEN NORTHINGTON,	:	18 U.S.C. § 1956(a)(1) (money laundering
a/k/a "Michael Tillery,"	:	– 5 counts)
a/k/a "Syeed Burhannon,"	:	18 U.S.C. § 922(g) (convicted felon in
a/k/a "Darnell Doss,"	:	Possession of a firearm – 2 counts)
a/k/a "Kevin Lewis,"	:	18 U.S.C. § 924(c) (possession of a
a/k/a "Smoke,"	:	firearm in furtherance of a drug
MELVIN STEIN	:	trafficking offense – 1 count)
JAMES WALKER,	:	18 U.S.C. § 1512(a)(2) (threatening a
a/k/a "Candy,"	:	witness – 3 counts)
DEREK RUSSELL,	:	18 U.S.C. § 1513(b) (threatening to
a/k/a "Fly"	:	retaliate against a witness – 3 counts)
		21 U.S.C. § 843(b) (using a telephone for
		facilitating drug trafficking – 6 counts)

Notice of Forfeiture

SECOND SUPERSEDING INDICTMENT

COUNT ONE

(Conspiracy to Manufacture and Distribute Cocaine and Cocaine Base)

THE GRAND JURY CHARGES THAT:

1. From in or about September 1999 through in or about April 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**KABONI SAVAGE,
a/k/a "Yusef Billa,"
a/k/a "Joseph Amill,"
a/k/a "Bon," "Bonnie,"
a/k/a "B,"
GERALD THOMAS,
a/k/a "Baha Jabbaar,"
a/k/a "Bubbie,"
STEVEN NORTINGTON,
a/k/a "Michael Tillery,"
a/k/a "Syed Burhannon,"
a/k/a "Darnell Doss,"
a/k/a "Kevin Lewis,"
a/k/a "Smoke,"
JAMES WALKER,
a/k/a "Candy,"
DEREK RUSSELL,
a/k/a "Fly"**

knowingly conspired and agreed together and with others known and unknown to the grand jury, including Eugene Coleman, a/k/a "Twin," Wendell Mason, Juan Rosado, a/k/a "Chuck," David Vacquez, Craig Oliver, Joslyn Morgan, Jr., Paul Daniels, a/k/a "Paul Robinson," a/k/a "P," Robert Wilks, a/k/a "Miami," a/k/a "Robert Williams," Dawud Bey, Oscar Francis, Myron Wilson, Joseph Newman, a/k/a "Gerald King," a/k/a "Yusef," Dammon Everett, a/k/a "Bud," Gregory Mills, a/k/a "Philly Frank," Daren Blackwell, a/k/a "Double," Tyrone Beal, a/k/a "Scoop," Demetrius Williams, a/k/a "Meat," Malik Jones, Ronald Jones, a/k/a "Sneaker Store," Richard Bond, and Stanley Smith, each of whom is charged elsewhere, and Kareem Bluntly, now deceased, to manufacture and distribute more than five kilograms of a mixture and substance containing cocaine, a Schedule II controlled substance, and more than 50 grams of a mixture and

substance containing cocaine base, commonly known as “crack,” a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. **GERALD THOMAS** and **KABONI SAVAGE** supervised, managed, organized and led a drug trafficking enterprise (the “Thomas-Savage Organization”), which processed and distributed kilogram quantities of cocaine in and around Philadelphia, Pennsylvania. Their activities included, but were not limited to, obtaining multi-kilogram quantities of cocaine and supplying the cocaine to other defendants and co-conspirators for distribution, maintaining an available supply of cocaine for the distributors, giving directions to members of the conspiracy, collecting proceeds from the distribution of cocaine, and mediating disputes among members of the organization.

3. The Thomas-Savage Organization obtained, received, possessed, processed, stored, and distributed hundreds of kilograms of cocaine, which the defendants and co-conspirators obtained from multiple suppliers in Pennsylvania, New York, Florida, and elsewhere.

(a) **GERALD THOMAS** obtained multiple kilogram quantities of cocaine from a supplier, known to the grand jury, based in Norristown, Pennsylvania.

(b) **KABONI SAVAGE** and others known and unknown to the grand jury obtained multiple kilogram quantities of cocaine from a supplier, known to the grand jury, based in Florida.

(c) Craig Oliver conducted kilogram quantity cocaine transactions, both as a supplier and distributor, with **KABONI SAVAGE** and **GERALD THOMAS**. The activities of Craig Oliver included but were not limited to obtaining multi-kilogram quantities of cocaine and supplying them to other defendants and co-conspirators for distribution. His

activities also included distributing cocaine and collecting proceeds from the distribution of cocaine.

(d) Juan Rosado, aided by David Vaquez, supplied **KABONI SAVAGE** with approximately 160 kilograms of cocaine. **SAVAGE** in turn supplied kilograms of cocaine obtained from Rosado and Vaquez to **GERALD THOMAS** and other co-conspirators known and unknown to the grand jury.

(e) **GERALD THOMAS** and **KABONI SAVAGE** obtained multiple kilogram quantities of cocaine from other suppliers, known and unknown to the grand jury, based in the Philadelphia area.

4. In an attempt to enhance its drug profits, the Thomas-Savage Organization broke down kilograms of cocaine, mixed the cocaine with procaine and other cutting agents and ingredients, then re-compressed the cocaine into kilogram brick form to give it the appearance of unadulterated cocaine. This process is known as “re-rocking” or “re-compressing” the cocaine.

(a) **GERALD THOMAS** procured the assistance of others known and unknown to the grand jury to obtain metal plates, presses, molds, and other equipment to be used by the Thomas-Savage Organization in breaking down, cutting, and re-compressing kilograms of cocaine. **THOMAS** instructed these other individuals as to the specifications needed for the metal presses, plates, molds, and other items of equipment, and these other individuals then obtained the metal presses, plates, molds, and other items from various welders to fit the dimensions requested by **THOMAS**.

(b) **KABONI SAVAGE** possessed and used equipment for the re-compression of cocaine, obtaining re-compression devices from **GERALD THOMAS** and other suppliers of such equipment.

(c) Eugene Coleman, Oscar Francis, and Kareem Bluntly worked for and with **KABONI SAVAGE**. Their activities included, but were not limited to, operating the re-rocking or re-compression devices in an effort to break down, cut, and re-compress kilograms

of cocaine obtained by **SAVAGE**. Coleman, Francis, and Bluntly also assisted in the distribution of cocaine, and in collecting proceeds from the distribution of cocaine.

(d) Daren Blackwell and Tyrone Beal worked for and with **GERALD THOMAS**, Paul Daniels, and Robert Wilks. Their activities included, but were not limited to, operating the re-rocking or re-compression devices in an effort to break down, cut, and re-compress the kilograms of cocaine obtained by **THOMAS**, Daniels, and Wilks. Blackwell and Beal also assisted **KABONI SAVAGE** in re-compressing kilograms of cocaine, and in distributing cocaine.

5. In an effort to expand its customers and to increase its profits, the Thomas-Savage Organization, including **GERALD THOMAS**, **KABONI SAVAGE**, **STEVEN NORTHINGTON**, Robert Wilks, Gregory Mills, Malik Jones, Ronald Jones, Richard Bond, and others known and unknown to the grand jury, also processed powder cocaine into cocaine base, also known as "crack" and "rock," for distribution to others.

6. Members of the Thomas-Savage Organization distributed cocaine and crack to other distributors.

(a) **STEVEN NORTHINGTON**, Paul Daniels, Robert Wilks, Dawud Bey, Myron Wilson, Joslyn Morgan, Jr., and others known and unknown to the grand jury, were supplied cocaine by **KABONI SAVAGE** for distribution to others.

(b) **JAMES WALKER**, **DEREK RUSSELL**, Dammon Everett, Demetrius Williams, Gregory Mills, Joseph Newman, Ronald Jones, Malik Jones, Richard Bond, and others known and unknown to the grand jury, were supplied cocaine by **GERALD THOMAS** for distribution to others.

7. The defendants and their co-conspirators used telephones, cellular telephones, and pagers to communicate among themselves and with others to further the objectives of the conspiracy. In particular, members of the conspiracy used these devices to arrange and discuss the purchase and distribution of cocaine, to discuss and determine quantities

and prices of cocaine available for distribution, to discuss amounts owed for cocaine, and to arrange for the collection and delivery of cash representing the proceeds from and payments for the distribution of cocaine.

(a) The defendants and their co-conspirators, in an effort to conceal their unlawful activities from law enforcement, used coded and cryptic language when discussing and negotiating cocaine transactions and deliveries, the prices associated with various quantities of cocaine, and the exchange and delivery of money. Code words used to refer to cocaine and/or crack included, but were not limited to: “chumps,” “brick,” “work,” “jawns,” “basketballs,” “birds,” “hard,” “soft,” “crack,” “powder,” “deuce,” “trey,” “dime,” “pound,” “nine,” and “four-and-a-half.” Code words used to refer to money or cash drug proceeds included, but were not limited to: “nickel,” “dime,” and “stack.”

8. **GERALD THOMAS, KABONI SAVAGE**, Paul Daniels, Daren Blackwell, Tyrone Beal, Oscar Francis, Eugene Coleman, Kareem Bluntly, and others known and unknown to the grand jury, operated and maintained "press houses" or “stash houses” that were used to store cocaine, re-compression devices, drug packaging materials, and other drug-related items. At these locations, the Thomas-Savage Organization operated re-compression devices, breaking down, cutting, and re-compressing kilograms of cocaine obtained by the organization. Cocaine and large amounts of money were dropped off and picked up at these locations. The locations of these press houses included, but were not limited to: 9451 Clark Street, Apt. 6, Philadelphia, Pennsylvania; The Village of Stony Run, Apartment 46C, Maple Shade, New Jersey; 3643 North Darien Street, Philadelphia, Pennsylvania; 1805 East Tulpehocken Street, Philadelphia, Pennsylvania; 396 East Upsal Street, Apt. C, Philadelphia, Pennsylvania; 1546 East Upsal Street, Philadelphia, Pennsylvania; 9 Blue Grass Road, Clementon, New Jersey; and 3510 Palmetto Street, Philadelphia, Pennsylvania. Other persons connected to the Thomas-Savage Organization operated re-compression devices at other locations, including but not limited to 450 Vernon Road, Philadelphia, Pennsylvania.

9. The defendants and their co-conspirators obtained, directly and indirectly, cash proceeds in exchange for the distribution of powder cocaine and crack cocaine.

(a) The defendants and their co-conspirators engaged in an arrangement known as “fronting,” in which the supplier provided cocaine to a co-conspirator without being paid, but with the agreement and expectation that full payment would be made after the cocaine had been distributed by the co-conspirator.

(b) The defendants and their co-conspirators received, collected, possessed, transported and delivered large amounts of cash, which constituted proceeds from the distribution of cocaine and money used to pay for cocaine.

(c) The defendants and their co-conspirators regularly met at 3643 North Darien Street, Philadelphia, Pennsylvania, the residence of **KABONI SAVAGE**, where they possessed and distributed cocaine, and exchanged and collected large amounts of cash, which constituted the proceeds from the distribution of cocaine.

(d) The defendants and their co-conspirators provided monetary gifts and financial support to co-conspirators and their families when members of the Thomas-Savage Organization were incarcerated to respect and promote loyalty among the co-conspirators.

(e) **MELVIN STEIN**, who is not charged in this Count but is charged in Counts Two and Three of this Indictment, assisted the Thomas-Savage Organization in laundering drug proceeds obtained from the distribution of cocaine, by knowingly accepting drug proceeds as payment for the purchase and rental of real property, and the purchase of automobiles, and by assisting members of the Thomas-Savage Organization to conceal the nature, source, ownership, and control of the drug proceeds, by placing the title to properties and vehicles in false names or the names of third parties, and by creating or submitting false documents or not documenting the transaction. Properties and automobiles obtained in this manner were used by the defendants and their co-conspirators in furtherance of the drug trafficking activities of the Thomas-Savage Organization.

10. **KABONI SAVAGE, GERALD THOMAS, STEVEN**

NORTHINGTON, and **DEREK RUSSELL**, and others known and unknown to the grand jury, obtained, stored, carried, and possessed firearms to protect themselves and their drug inventories, profits, proceeds and other drug-related activities in furtherance of the Thomas-Savage Organization.

11. **KABONI SAVAGE** and others known and unknown to the grand jury

committed, attempted to commit, and threatened to commit acts of violence to protect drug profits, to collect drug debts, and to further the objectives of the conspiracy.

12. **GERALD THOMAS, KABONI SAVAGE, STEVEN**

NORTHINGTON, Paul Daniels, Robert Wilks, Craig Oliver, and others known and unknown to the grand jury, in an effort to evade detection from law enforcement, to conceal their illegal activities, and to disguise the nature, source, and location of their drug proceeds, used false names, surrogates, or straw purchasers to obtain motor vehicles, cell phones, apartments, real estate, and other property. For example, **KABONI SAVAGE** used the false names “Joseph Amill” and “Yusef Billa”; **GERALD THOMAS** used the false name “Baha Jabbaar”; **STEVEN NORTHINGTON** used the false names “Michael Tillery” and “Syeed Burhannon,” among others; Paul Daniels used the false name “Paul Robinson”; Robert Wilks used the false name “Robert Williams”; and Craig Oliver used the false names “James Blair” and “Craig Walters.”

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, the following overt acts, among others, were performed in the Eastern District of Pennsylvania and elsewhere:

1. On or about September 8, 1999, **KABONI SAVAGE** and an individual

known to the grand jury obtained at least ten kilograms of cocaine from a supplier based in Florida.

2. On or about September 8, 1999, **KABONI SAVAGE**, Eugene Coleman,

and other persons known to the grand jury, manufactured and re-compressed at least ten

kilograms of cocaine at Village of Stony Run, Apartment 46C, Maple Shade, New Jersey, an apartment leased to **KABONI SAVAGE** under the false name “Joseph Amill.”

3. On or about September 8, 1999, **KABONI SAVAGE** distributed multi-kilogram quantities of cocaine to **GERALD THOMAS** and Myron Wilson for distribution to others.

4. On or about September 10, 1999, **KABONI SAVAGE** and other persons known and unknown to the grand jury occupied Apartment 46C, located at Village of Stony Run, Maple Shade, New Jersey, which was rented by **SAVAGE** under the false name “Joseph Amill,” and where cocaine, “re-rocking” presses, packaging materials, and substances used as “cutting” agents were stored.

5. On or about September 17, 1999, **KABONI SAVAGE** possessed items used in the re-compression of cocaine at a self-storage locker at Devon Self-Storage, 12005 Roosevelt Boulevard, Philadelphia, Pennsylvania, which **SAVAGE** leased under the false name “Joseph Amill.”

6. In or about May 2000, **GERALD THOMAS**, and others known and unknown to the grand jury, offered monetary gifts and financial support to **KABONI SAVAGE** as a show of respect and loyalty upon his release from custody in an unrelated matter.

7. In or about May 2000, Craig Oliver distributed approximately three kilograms of cocaine to **KABONI SAVAGE** at 3643 North Darien Street, Philadelphia, Pennsylvania.

8. In or about May 2000, **GERALD THOMAS** delivered steel presses and molds, which he intended to be used for the manufacture and re-compression of kilograms of cocaine, to **KABONI SAVAGE** and other co-conspirators at 3643 North Darien Street.

9. In or about May 2000, **KABONI SAVAGE**, Kareem Bluntly, and Eugene Coleman manufactured and re-compressed approximately three kilograms of cocaine at 3643 North Darien Street.

10. In or about the summer of 2000, **KABONI SAVAGE** met Juan Rosado at Morgan's Auto Tags, Ninth and Cayuga Streets, Philadelphia, Pennsylvania, to negotiate the sale and purchase of one kilogram of cocaine.

11. In or about the summer of 2000, **KABONI SAVAGE** advised Juan Rosado that he could "move," that is, distribute as much cocaine as Rosado could supply, and he requested that Rosado regularly supply **SAVAGE** with multiple kilograms of cocaine.

12. From in or about the summer of 2000 through on or about January 18, 2001, Juan Rosado distributed multiple-kilogram quantities of cocaine one to two times per week to **KABONI SAVAGE**.

13. From in or about the summer of 2000 through on or about January 18, 2001, Eugene Coleman, Kareem Bluntly, Daren Blackwell, Tyrone Beal, Oscar Francis, and others known and unknown to the grand jury, regularly manufactured and re-compressed multiple kilograms of cocaine at the direction of **KABONI SAVAGE** and **GERALD THOMAS**.

14. On or about September 27, 2000, **KABONI SAVAGE**, **GERALD THOMAS**, and Paul Daniels had telephone conversations, in which they negotiated and arranged in coded and cryptic language for **SAVAGE** to provide **THOMAS** and Daniels with at least two kilograms of cocaine.

15. On or about September 27, 2000, **GERALD THOMAS** had a telephone conversation with Kenneth Clark, who has been charged elsewhere, in which **THOMAS** requested in coded and cryptic language that Clark supply and deliver equipment needed in the re-compression of cocaine.

16. On or about September 27, 2000, **GERALD THOMAS** and Dammon Everett had telephone conversations in which they arranged in coded and cryptic language for **THOMAS** to provide Everett with one kilogram of cocaine.

17. On or about September 27 and 28, 2000, **GERALD THOMAS** had telephone conversations with Tyrone Beal and Paul Daniels, in which they discussed in coded and cryptic language the re-compression of the kilograms of cocaine by Tyrone Beal and Daren Blackwell at Paul Daniel's house, which at that time was located at 1805 East Tulpehocken Street.

18. On or about September 28, 2000, **GERALD THOMAS** had telephone conversations with Richard Bond, in which they arranged in coded and cryptic language for **THOMAS** to provide Bond with cocaine, and in which Bond directed **THOMAS** to meet him at an agreed-upon location.

19. On or about October 2, 2000, **GERALD THOMAS** had telephone conversations with Richard Bond, in which they arranged in coded and cryptic language for **THOMAS** to provide Bond with cocaine base ("crack") and in which they further discussed the process of cooking cocaine into crack.

20. On or about October 7, 2000, **GERALD THOMAS** had telephone conversations with Richard Bond, in which they arranged in coded and cryptic language for **THOMAS** to provide Bond with three ounces of crack.

21. On or about October 7, 2000, **GERALD THOMAS** had a telephone conversation with **KABONI SAVAGE**, in which **THOMAS** instructed **SAVAGE** in coded and cryptic language to obtain six kilograms of cocaine from a supplier who had offered to supply **SAVAGE** with cocaine for \$27,500 per kilogram.

22. On or about October 8, 2000, **KABONI SAVAGE** had a telephone conversation with **GERALD THOMAS**, in which they discussed in coded and cryptic language **SAVAGE**'s distribution of two kilograms of cocaine to an unidentified person, and the availability of another five kilograms of cocaine.

23. On or about October 18, 2000, **KABONI SAVAGE**, **GERALD THOMAS**, and Paul Daniels had telephone conversations in which they negotiated and arranged

in coded and cryptic language for **SAVAGE** and **THOMAS** to provide Daniels with at least one-half kilogram of cocaine.

24. On or about October 21, 2000, **GERALD THOMAS** had a telephone conversation with Paul Daniels, in which **THOMAS**, speaking in coded and cryptic language, informed Daniels that **KABONI SAVAGE** wanted Daren Blackwell and Tyrone Beal to manufacture and re-compress cocaine.

25. On or about October 23, 2000, **JAMES WALKER** had a telephone conversation with **GERALD THOMAS**, in which they arranged in coded and cryptic language for **WALKER** to provide **THOMAS** with \$3,500 as payment for a prior cocaine transaction.

26. On or about November 2, 2000, **GERALD THOMAS**, **KABONI SAVAGE**, Eugene Coleman, and Kareem Bluntly had telephone conversations in which they discussed in coded and cryptic language the need to replace equipment and materials used in the manufacture and re-compression of cocaine.

27. On or about November 7, 2000, **KABONI SAVAGE** had a telephone conversation with **GERALD THOMAS**, in which **SAVAGE** informed **THOMAS** in coded and cryptic language that **SAVAGE** had recently obtained five kilograms of cocaine, and he instructed **THOMAS** to contact Kenneth Clark to obtain the equipment needed to cut and re-compress the cocaine.

28. On or about November 14, 2000, **GERALD THOMAS** had telephone conversations with Dammon Everett, in which they arranged in coded and cryptic language for **THOMAS** to provide Everett with at least one kilogram of cocaine.

29. On or about November 14, 2000, **GERALD THOMAS** had telephone conversations with Kenneth Clark, in which they arranged in coded and cryptic language for Clark to supply **THOMAS** and **KABONI SAVAGE** with properly measured molds and plates needed to re-compress kilograms of cocaine.

30. On or about November 14, 2000, **GERALD THOMAS** had a telephone conversation with a person unknown to the grand jury, in which **THOMAS** offered in coded and cryptic language to sell a “brick,” meaning one kilogram of cocaine, for \$27,500.

31. On or about November 23, 2000, Juan Rosado delivered approximately ten kilograms of cocaine to **KABONI SAVAGE**.

32. On or about November 27, 2000, **GERALD THOMAS** met Gregory Mills in the 3600 block of North Darien Street, after **THOMAS** and Mills had telephone conversations in which they arranged in coded and cryptic language for **THOMAS** to provide Mills with approximately nine ounces of cocaine.

33. On or about December 1, 2000, **KABONI SAVAGE** had a telephone conversation with **GERALD THOMAS**, in which **SAVAGE** informed **THOMAS** in coded and cryptic language that **SAVAGE** had arranged with a supplier to obtain five kilograms of cocaine; **THOMAS** indicated that he was going to begin re-compressing two kilograms of cocaine that were then in his possession.

34. On or about December 1, 2000, **DEREK RUSSELL** had telephone conversations with **GERALD THOMAS** and arranged in coded and cryptic language to obtain seven ounces of cocaine from **THOMAS**, which **THOMAS** stated was concealed under a bathroom sink at **THOMAS**’s store (616 North 11th Street, Philadelphia, Pennsylvania).

35. On or about December 5, 2000, **GERALD THOMAS** had telephone conversations with **KABONI SAVAGE** and Paul Daniels, in which they arranged in coded and cryptic language for Daniels to pay **SAVAGE** approximately \$30,000.

36. On or about December 7, 2000, Gregory Mills had telephone conversations with **GERALD THOMAS** and arranged in coded and cryptic language to obtain nine ounces of cocaine from **THOMAS**.

37. On or about December 8, 2000, **GERALD THOMAS** had a telephone conversation with Wendell Mason, in which they discussed in coded and cryptic language the costs associated with the sale and purchase of kilograms of cocaine.

38. On or about December 8, 2000, Gregory Mills had telephone conversations with **GERALD THOMAS** and informed him in coded and cryptic language that Mills had a customer looking to buy 125 grams of cocaine. **THOMAS** and Mills further discussed the mechanics of cooking cocaine into crack.

39. On or about December 12, 2000, **KABONI SAVAGE** had telephone conversations with **GERALD THOMAS**, in which **SAVAGE** informed **THOMAS** in coded and cryptic language that **SAVAGE** had recently obtained ten kilograms of cocaine, but that most of the kilograms had been distributed to customers who had been waiting to receive cocaine. **SAVAGE** agreed to supply **THOMAS** with one kilogram of cocaine, and **SAVAGE**, using coded and cryptic language, instructed **THOMAS** to have Daren Blackwell come to **SAVAGE**'s house to facilitate the re-compression of cocaine.

40. On or about December 15, 2000, **GERALD THOMAS** had telephone conversations with Kenneth Clark, in which **THOMAS** arranged for Clark to deliver materials and presses to be used in the manufacture and re-compression of cocaine.

41. On or about December 19, 2000, Dammon Everett had a telephone conversation with **GERALD THOMAS**, in which Everett stated in coded and cryptic language his interest in obtaining cocaine. **THOMAS** then contacted **KABONI SAVAGE** and arranged in coded and cryptic language to obtain one kilogram of good quality cocaine for Everett.

42. On or about December 21, 2000, Kenneth Clark had telephone conversations with **GERALD THOMAS** and arranged to deliver three properly measured press molds and plates to be used in the manufacture and re-compression of cocaine that were ordered by **KABONI SAVAGE**.

43. On or about December 25, 2000, Juan Rosado distributed at least five kilograms of cocaine to **KABONI SAVAGE**.

44. On or about January 6, 2001, **GERALD THOMAS** had a telephone conversation with Daren Blackwell and asked in coded and cryptic language how many bottles of procaine (a cutting agent used in the re-compression of cocaine) were available at 396 East Upsal Street. After this conversation, **THOMAS** went to 396 East Upsal Street.

45. On or about January 7, 2001, **KABONI SAVAGE**, using a firearm, restrained, assaulted, and threatened to kill a person known to the grand jury, and forcibly took from that person money which **SAVAGE** believed had been stolen from his drug proceeds.

46. From on or about January 9, 2001, through on or about January 13, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they arranged in coded and cryptic language for Mason to provide **THOMAS** with two kilograms of cocaine.

47. On or about January 17, 2001, **DEREK RUSSELL** had telephone conversations with **GERALD THOMAS** and informed him in coded and cryptic language that **RUSSELL** had a potential customer who wanted to know the price for both a half-kilogram and a whole kilogram of cocaine. **THOMAS** replied that a half-kilogram would cost \$14,500, and that one kilogram would cost \$29,000.

48. On or about January 18, 2001, Juan Rosado supplied **KABONI SAVAGE** with approximately nine kilograms of cocaine.

49. On or about January 19, 2001, Kenneth Clark met **KABONI SAVAGE** and **GERALD THOMAS** at Mazer Real Estate, 8229 Stenton Road, Philadelphia, Pennsylvania, and provided **SAVAGE** and **THOMAS** with cocaine re-compression devices.

50. On or about January 19, 2001, Daren Blackwell had a telephone conversation with **GERALD THOMAS** and, using coded and cryptic language, inquired about obtaining cocaine.

51. On or about January 19, 2001, **GERALD THOMAS** and **KABONI SAVAGE** distributed approximately two kilograms of cocaine to Myron Wilson.

52. On or about January 19, 2001, **JAMES WALKER** had telephone conversations with **GERALD THOMAS**, in which they arranged in coded and cryptic language for an individual known to the grand jury to meet **THOMAS** near the 3600 block of North Darien Street, and to obtain from **THOMAS** approximately 4 ½ ounces of cocaine.

53. On or about January 24, 2001, Dammon Everett had a telephone conversation with **GERALD THOMAS** and arranged in coded and cryptic language for Everett to obtain cocaine from **THOMAS** at the price they had previously discussed.

54. From on or about January 25, 2001, through on or about January 27, 2001, Kenneth Clark had telephone conversations with **GERALD THOMAS**, in which Clark arranged in coded and cryptic language to deliver four re-compression devices to **KABONI SAVAGE**'s house, located at 3643 North Darien Street.

55. On or about January 30, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they arranged in coded and cryptic language for Mason to provide **THOMAS** with two to eight kilograms of cocaine. **THOMAS** and Mason subsequently met at 6528 Limekiln Pike, Philadelphia, Pennsylvania.

56. On or about January 31, 2001, Joseph Newman had telephone conversations with **GERALD THOMAS**, in which they arranged in coded and cryptic language for Newman to provide **THOMAS** and **KABONI SAVAGE** with at least three kilograms of cocaine, and in which **THOMAS** attempted to obtain several more kilograms of cocaine from Newman.

57. On or about January 31, 2001, **GERALD THOMAS** had telephone conversations with D.M., a person known to the grand jury, in which **THOMAS** related in coded and cryptic language that he and **KABONI SAVAGE** had been searching for cocaine, and that **THOMAS** had taken his gun with him during the search. **THOMAS** and D.M. agreed that when

either of them obtained cocaine, he would contact the other, and **THOMAS** indicated that he needed an additional eight kilograms of cocaine.

58. On or about February 3, 2001, Joseph Newman had telephone conversations with **GERALD THOMAS**, in which they arranged in coded and cryptic language for Newman to provide **THOMAS** with five kilograms of cocaine, and in which they discussed **THOMAS**'s interest in obtaining an additional eight kilograms of cocaine from Newman the next day.

59. On or about February 13 and 14, 2001, **DEREK RUSSELL** had telephone conversations with **GERALD THOMAS** and offered in coded and cryptic language to sell two firearms to **THOMAS**.

60. On or about February 13 and 14, 2001, **GERALD THOMAS** had telephone conversations with **DEREK RUSSELL** and Demetrius Williams in which they arranged in coded and cryptic language for **THOMAS** to provide **RUSSELL**, Williams, and an unidentified person with eleven ounces of cocaine.

61. On or about February 14 and 15, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they arranged in coded and cryptic language to meet at 57 Bonnie Gelman Drive, Philadelphia, Pennsylvania (Mason's residence), where Mason was to provide **THOMAS** with seven kilograms of cocaine.

62. On or about February 15, 2001, **GERALD THOMAS** met Wendell Mason at 57 Bonnie Gelman Drive.

63. On or about February 17, 2001, **GERALD THOMAS** had a telephone conversation with **KABONI SAVAGE**, in which they arranged in coded and cryptic language for Robert Wilks to retrieve at least one-half kilogram of cocaine from **SAVAGE**.

64. From on or about February 21, 2001, through on or about February 22, 2001, **GERALD THOMAS** had telephone conversations with **DEREK RUSSELL** and Malik

Jones and attempted to resolve a dispute over control of certain drug territory between **RUSSELL** and Jones.

65. On or about February 26, 2001, **DEREK RUSSELL** and others distributed three vials of crack cocaine to a police confidential informant.

66. From on or about March 16, 2001, through on or about March 20, 2001, **KABONI SAVAGE** had telephone conversations with a person known to the grand jury, in which they discussed in coded and cryptic language whether that person could provide **SAVAGE** with cocaine.

67. On or about March 17, 2001, **KABONI SAVAGE** had a telephone conversation with Myron Wilson, in which they arranged in coded and cryptic language to meet in furtherance of a drug transaction.

68. On or about June 13, 2001, **GERALD THOMAS** had telephone conversations with Wendell Mason, in which they attempted to arrange in coded and cryptic language for Mason to supply to **THOMAS** five kilograms of cocaine.

69. On or about June 14, 2001, Wendell Mason possessed five kilograms of cocaine for distribution to **GERALD THOMAS**.

70. On or about June 14, 2001, **GERALD THOMAS** had a telephone conversation with Wendell Mason and, using coded and cryptic language, attempted to complete the purchase of five kilograms of cocaine.

71. In or about April 2002, **KABONI SAVAGE** and Kareem Bluntly obtained five kilograms of cocaine in South Philadelphia from a person known to the grand jury.

72. In or about April 2002, **KABONI SAVAGE** and Kareem Bluntly obtained another five kilograms of cocaine at a gas station in North Philadelphia from a person known to the grand jury.

73. On or about May 23, 2002, Robert Wilks possessed approximately 348 grams of cocaine and 142 grams of crack, a firearm, false identification, latex gloves, a heat

sealer, drug packaging materials, and other items used in the processing, packaging, and distribution of cocaine and crack.

74. On or about January 30, 2003, **KABONI SAVAGE, STEVEN NORTHINGTON**, and other persons unknown to the grand jury, arrived at 3510 Palmetto Street, Philadelphia, Pennsylvania, to re-compress cocaine.

75. On or about February 27, 2003, **STEVEN NORTHINGTON** possessed approximately 90 packets of cocaine, various items used in the processing and packaging of cocaine, two firearms, and assorted ammunition.

76. On or about March 11, 2003, at the request of **GERALD THOMAS**, Eugene Coleman re-compressed one kilogram of cocaine, which Coleman then delivered to **THOMAS** outside of 3510 Palmetto Street.

77. On or about April 7, 2003, **KABONI SAVAGE**, Oscar Francis, Eugene Coleman, and other persons known and unknown to the grand jury, possessed items used in the manufacture, processing, and re-compression of cocaine, including re-compression devices, numerous bottles and empty bottles of procaine and other cutting agents, and other drug-related items, at 3510 Palmetto Street.

78. On or about April 7, 2003, **KABONI SAVAGE** possessed a mini-blender with cocaine residue and procaine, which are used in the manufacture, processing, and re-compression of cocaine, at 3643 North Darien Street.

79. On or about April 7, 2003, **KABONI SAVAGE** and **STEVEN NORTHINGTON** possessed firearms at 3643 North Darien Street.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

(Money Laundering Conspiracy)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs two through twelve and Overt Acts one through seventy-nine of Count One are incorporated here.

2. From in or about September 1994 through in or about July 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**MELVIN STEIN
and
GERALD THOMAS,
a/k/a "Baha Jabbaar,"
a/k/a "Bubbie,"**

and others known and unknown to the grand jury, including Paul Daniels, Robert Wilks, and Craig Oliver, each of whom are charged elsewhere, knowingly conspired and agreed to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, knowing that the property involved in those financial transactions represented the proceeds of some form of unlawful activity, and which property in fact involved the proceeds of specified unlawful activity, that is, narcotics trafficking, punishable under the laws of the United States, with the intent to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS

It was part of the conspiracy that:

1. **GERALD THOMAS** frequently contacted **MELVIN STEIN**, a licensed real estate agent, on behalf of **THOMAS** and other persons associated with the Thomas-Savage Organization, including Paul Daniels, Robert Wilks, and Craig Oliver, to enlist **STEIN**'s aid in laundering the proceeds of narcotics trafficking.

2. **MELVIN STEIN**, as a licensed real estate agent, knowingly accepted drug proceeds from **GERALD THOMAS**, Paul Daniels, Robert Wilks, Craig Oliver, and other

persons known and unknown to the grand jury, in exchange for the lease and sale of real properties in Philadelphia, and for the sale of certain vehicles.

3. **MELVIN STEIN** assisted **GERALD THOMAS**, Paul Daniels, Robert Wilks, Craig Oliver, and other persons known and unknown to the grand jury, in purchasing or leasing real properties in Philadelphia in the names of aliases, third parties, or with no documentation, contrary to the standard practices of the real estate firm in which **STEIN** conducted business.

4. **MELVIN STEIN** sold motor vehicles to Robert Wilks and Craig Oliver, and **STEIN** assisted Wilks and Oliver in transferring title of the vehicles into the names of third parties or aliases.

5. **MELVIN STEIN** discussed by telephone and in person with **GERALD THOMAS**, Paul Daniels, Robert Wilks, Craig Oliver, and other persons known and unknown to the grand jury, ways and means to conceal assets and income derived from narcotics trafficking.

6. At **MELVIN STEIN**'s instructions, **GERALD THOMAS**, Paul Daniels, Robert Wilks, Craig Oliver, and **MELVIN STEIN** conducted face-to-face meetings at locations other than **STEIN**'s place of business, or after business hours, or outside the view and presence of **MELVIN STEIN**'s coworkers, so as not to draw attention to their unlawful purposes. At these meetings, **THOMAS**, Daniels, Wilks, and Oliver transferred lump sum amounts of cash, often thousands of dollars at a time, and which constituted the proceeds of narcotics trafficking, to **STEIN** as payment for real estate properties and cars, none of which were leased or titled in the names of Daniels, Wilks, or Oliver.

7. **MELVIN STEIN** received and held lump-sum cash drug proceeds as security for co-conspirator Paul Daniels, and **STEIN** further transferred to Daniels checks payable to a business entity to assist Daniels in making certain transactions appear legitimate.

8. **MELVIN STEIN** made false and misleading statements to law enforcement to conceal the identities and activities of **GERALD THOMAS**, Paul Daniels, Robert Wilks, and Craig Oliver, and **STEIN**'s association with these individuals.

Money Laundering Transaction #1
(1546 East Upsal Street)

9. From in or about September 1994 through in or about July 2003, Robert Wilks rented the premises located at 1546 East Upsal Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Wilks to pay the rent, **STEIN** leased the property to Wilks in the names of S.W. and A.D., persons known to the grand jury. During this period, Wilks paid **STEIN** a total of approximately \$112,835 cash proceeds from illegal drug trafficking as rental payments for that property.

Money Laundering Transaction #2
(1805 East Tulpehocken Street – rental)

10. From in or about September 1994 through in or about March 1996, Paul Daniels rented the premises located at 1805 East Tulpehocken Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Daniels to pay the rent, **STEIN** leased the property without a written lease agreement, all payments were made in cash, and the log entries of the rental payments maintained by **STEIN** indicate that the lessee is defendant **GERALD THOMAS**. During this period, Daniels paid **STEIN** a total of approximately \$17,325 cash proceeds from illegal drug trafficking as rental payments for that property.

Money Laundering Transaction #3
(1805 East Tulpehocken Street – purchase)

11. From in or about March 1996 through in or about July 2003, Paul Daniels resided at and owned the premises located at 1805 East Tulpehocken Street, Philadelphia, Pennsylvania. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Daniels to pay the mortgage on the property, **STEIN** held the mortgage in the name of G.S., a person known to the grand jury. During this period, Daniels paid **STEIN** a total of at least \$109,147 cash proceeds from illegal drug trafficking as mortgage payments for that property.

Money Laundering Transaction #4
(7502 Thouron Avenue – Wilks)

12. From in or about May 1996 through in or about February 1998, Robert Wilks rented the second floor of the premises located at 7502 Thouron Avenue, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Wilks to pay the rent, **STEIN** leased the property to Wilks in the name of “Vanessa Williams.” During this period, Wilks paid **STEIN** a total of approximately \$10,450 cash proceeds from illegal drug trafficking as rental payments for that property.

Money Laundering Transaction #5
(7502 Thouron Avenue – Daniels)

13. From in or about May 1996 through in or about February 1998, Paul Daniels rented the first floor of the premises located at 7502 Thouron Avenue, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Daniels to pay the rent, **STEIN** leased the property to Daniels without a written lease agreement or other paperwork, and all payments were made in cash. During this period, Daniels paid **STEIN** a total of approximately \$10,450 cash proceeds from illegal drug trafficking as rental payments for that property.

Money Laundering Transaction #6
(2000 Cheltenham Avenue)

14. From in or about March 1998 through in or about March 1999, Robert Wilks and Paul Daniels rented the premises located at 2000 Cheltenham Avenue, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Wilks and Daniels to pay the rent, **STEIN** jointly leased the property to Wilks and Daniels in the names of “Robert Williams” and “Paul Robinson,” respectively. During this period, Wilks and Daniels collectively paid **STEIN** a total of approximately \$14,000 cash proceeds from illegal drug trafficking as rental payments for that property.

Money Laundering Transaction #7
(1994 Nissan Maxima)

15. On or about June 10, 1999, Robert Wilks purchased a 1994 Nissan Maxima for approximately \$7,000 from **MELVIN STEIN**, who sold the car to Wilks on behalf of a family member of **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Wilks to purchase the car, Wilks and **STEIN** caused the car to be titled in the name of "Robert Williams," an alias used by Wilks.

Money Laundering Transaction #8
(1995 BMW)

16. In or about December 2000, Robert Wilks purchased a 1995 BMW for approximately \$25,000 from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Wilks to purchase the car, Wilks and **STEIN** caused the car to be titled in the name of R.D., a person known to the grand jury and who acted as the straw purchaser.

Money Laundering Transaction #9
(8563 Williams Avenue)

17. From in or about March 2000 through in or about August 2002, Craig Oliver rented the premises located at 8563 Williams Avenue, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** prepared the lease and all paperwork in the name of K.O., a person known to the grand jury. Oliver paid **STEIN** a total of approximately \$28,885 in cash proceeds from illegal drug trafficking as rental payments for that property.

Money Laundering Transaction #10
(\$50,000 Check to Philadelphia Entertainment Group)

18. In or about June 2001, Paul Daniels invested \$50,000 in cash drug proceeds in a business venture attempted by Daniels and his company, Philadelphia Entertainment Group. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Daniels to invest in the business, defendant

MELVIN STEIN provided Daniels with a check payable to Philadelphia Entertainment Group in the amount of \$50,000. As collateral for the check, Daniels provided **STEIN** with \$50,000 in cash drug proceeds, which **STEIN** held in his possession until Daniels paid interest to **STEIN** from his earnings on the business venture.

Money Laundering Transaction #11
(7507 Woolston Street)

19. From in or about March 2002 through in or about July 2003, Craig Oliver rented the premises located at 7507 Woolston Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** prepared the lease and all paperwork in the name of E.B., a person known to the grand jury. Oliver paid **STEIN** a total of approximately \$15,895 in cash drug proceeds as rental payments for that property.

Money Laundering Transaction #12
(450 Vernon Road)

20. From in or about March 2003 through in or about July 2003, Craig Oliver rented the premises located at 450 Vernon Road, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** leased the property without a written lease agreement or other paperwork, and all payments were made in cash. Oliver paid **STEIN** a total of approximately \$4,500 in cash drug proceeds as rental payments for that property.

Money Laundering Transaction #13
(728 Phil Ellena Street)

21. From in or about June 2002 through in or about July 2003, Craig Oliver rented the premises located at 728 Phil Ellena Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** prepared the lease and all

paperwork in the false name “James Blair.” Oliver paid **STEIN** a total of approximately \$25,425 in cash drug proceeds as rental payments for that property.

Money Laundering Transaction #14
(7963 Fayette Street)

22. From in or about March 2002 through in or about July 2003, Craig Oliver rented the premises located at 7963 Fayette Street, Philadelphia, Pennsylvania, from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to pay the rent, **STEIN** leased the property without a written lease agreement or other paperwork, and all payments were made in cash. Oliver paid **STEIN** a total of approximately \$14,450 in cash drug proceeds as rental payments for that property.

Money Laundering Transaction #15
(1999 Toyota Solara)

23. In or about September 2002, using proceeds from illegal drug trafficking, Craig Oliver purchased a 1999 Toyota Solara for approximately \$17,000 from **MELVIN STEIN**. To disguise and conceal the nature, the location, the source, the ownership, and the control of drug proceeds used by Oliver to purchase the vehicle, Oliver and **STEIN** caused the car to be titled in the name of K.O., a person known to the grand jury and who acted as the straw purchaser.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT THREE

(Money Laundering)

1. Paragraphs two through twelve and Overt Acts one through seventy-nine of Count One of this Indictment are incorporated here.

_____2. On or about June 7, 2001, in the Eastern District of Pennsylvania, defendant

MELVIN STEIN

knowingly engaged in and attempted to engage in, and aided, abetted, and willfully caused, a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, that is, defendant **MELVIN STEIN** exchanged a check to Paul Daniels payable to Philadelphia Entertainment Group in the amount of \$50,000, for the transfer from Daniels to **STEIN** of \$50,000 in cash drug proceeds, which **STEIN** held in his possession as collateral security for the check, and such property was derived from a specified unlawful activity, that is, conspiracy to manufacture and distribute cocaine, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Sections 1957 and 2.

COUNTS FOUR THROUGH EIGHT

(Money Laundering)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs two through twelve and Overt Acts one through seventy-nine of Count One of this Indictment are incorporated here.

2. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

**KABONI SAVAGE,
a/k/a "Yusef Billa,"
a/k/a "Joseph Amill,"
a/k/a "Bon," "Bonnie,"
a/k/a "B,"**

knowingly conducted and attempted to conduct the following financial transactions affecting interstate and foreign commerce:

<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
4	January 26, 2001	KABONI SAVAGE purchased a 1998 Ford from Chapman Ford, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the car was approximately \$20,135.
5	September 12, 2001	KABONI SAVAGE purchased a 2001 Jeep from Triboro Motors, Cinnaminson, New Jersey, in the false name "Yusef Billa." The purchase price of the car was approximately \$38,895.
6	January 29, 2002	KABONI SAVAGE purchased a house located at 1732 Kendrick Street, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the house was approximately \$127,500.
7	March 30, 2002	KABONI SAVAGE purchased a 2002 Subaru from Wilkie Subaru, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the car was approximately \$29,094.
8	June 24, 2002	KABONI SAVAGE purchased a house located at 6641 Lynford Street, Philadelphia, Pennsylvania, in the false name "Yusef Billa." The purchase price of the house was approximately \$65,900.

3. When conducting and attempting to conduct each of the financial transactions described in paragraph two above, **KABONI SAVAGE** knew that the money involved in each financial transaction constituted the proceeds of some form of unlawful activity.

4. Each financial transaction described in paragraph two involved the proceeds of a specified unlawful activity, that is, conspiracy to manufacture and distribute cocaine and cocaine base, as charged in Count One of this Indictment, and **KABONI SAVAGE** acted knowing that each transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT NINE

(Money Laundering)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs two through twelve and Overt Acts one through seventy-nine of Count One of this Indictment are incorporated here.

2. On or about December 29, 2003, in the Eastern District of Pennsylvania, defendant

**STEVEN NORTHINGTON,
a/k/a "Michael Tillery,"
a/k/a "Syed Burhannon,"
a/k/a "Darnell Doss,"
a/k/a "Kevin Lewis,"
a/k/a "Smoke,"**

knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, that is, **STEVEN NORTHINGTON** purchased a 1999 Pontiac Grand Prix from Carl H. & Ruth Auto Sales, Plymouth Meeting, Pennsylvania, in the false name "Syed Burhannon." The purchase price of the car was approximately \$5,000.

3. When conducting and attempting to conduct the financial transaction described in paragraph two above, **STEVEN NORTHINGTON** knew that the money involved in the financial transaction constituted the proceeds of some form of unlawful activity.

4. The financial transaction described in paragraph two involved the proceeds of a specified unlawful activity, that is, distribution of cocaine and cocaine base, punishable under the laws of the United States, and **STEVEN NORTHINGTON** acted knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT TEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Offense)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

knowingly possessed a firearm, that is, a semi-automatic handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to manufacture and distribute more than five kilograms of cocaine and more than 50 grams of cocaine base, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT ELEVEN

(Convicted Felon in Possession of a Firearm)

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 27, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**STEVEN NORTINGTON,
a/k/a “Michael Tillery,”
a/k/a “Syed Burhannon,”
a/k/a “Darnell Doss,”
a/k/a “Kevin Lewis,”
a/k/a “Smoke,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce certain firearms, that is, an Intertec AB-10 9mm automatic handgun with an obliterated serial number, and a Davis Industries P-380 handgun (serial number AP503610).

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWELVE

(Convicted Felon in Possession of a Firearm)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 7, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendants

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

and

**STEVEN NORTINGTON,
a/k/a “Michael Tillery,”
a/k/a “Syed Burhannon,”
a/k/a “Darnell Doss,”
a/k/a “Kevin Lewis,”
a/k/a “Smoke,”**

each having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce certain firearms, that is, a Sig Sauer P225 9mm semi-automatic handgun (serial number M586419), and a Ruger Redhawk .44 caliber semi-automatic handgun (serial number 502-15971).

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTEEN

(Threatening a Witness)

THE GRAND JURY FURTHER CHARGES THAT:

In or about late July or early August 2004, in the Eastern District of Pennsylvania,
defendant

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

knowingly threatened to kill and use physical force against the son of Paul Daniels, with intent to influence, delay, and prevent the testimony of Paul Daniels in an official proceeding, that is, the trial of defendant **KABONI SAVAGE** on federal narcotics charges.

In violation of Title 18, United States Code, Section 1512(a)(2)(A).

COUNT FOURTEEN

(Threatening a Witness)

THE GRAND JURY FURTHER CHARGES THAT:

In or about September 2004, in the Eastern District of Pennsylvania, defendant

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

knowingly threatened to kill and to use physical force against Juan Rosado, and threatened to kill and use physical force against members of Juan Rosado’s family, with intent to influence, delay, and prevent the testimony of Juan Rosado in an official proceeding, that is, the trial of defendant **KABONI SAVAGE** on federal narcotics charges.

In violation of Title 18, United States Code, Section 1512(a)(2)(A).

COUNT FIFTEEN

(Threatening a Witness)

THE GRAND JURY FURTHER CHARGES THAT:

In or about September 2004, in the Eastern District of Pennsylvania, defendant

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

knowingly threatened to kill and use physical force against members of Stanley Smith’s family, with intent to influence, delay, and prevent the testimony of Stanley Smith in an official proceeding, that is, the trial of defendant **KABONI SAVAGE** on federal narcotics charges.

In violation of Title 18, United States Code, Section 1512(a)(2)(A).

COUNT SIXTEEN

(Threatening to Retaliate Against a Witness)

THE GRAND JURY FURTHER CHARGES THAT:

In or about late July or early August 2004, in the Eastern District of Pennsylvania,
defendant

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

knowingly threatened to engage in conduct to cause bodily injury to the son of Paul Daniels, with intent to retaliate against Paul Daniels for providing information relating to the commission and possible commission of a federal offense given by Paul Daniels to a law enforcement officer, that is, a Special Agent employed by the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 1513(b)(2).

COUNT SEVENTEEN

(Threatening to Retaliate Against a Witness)

THE GRAND JURY FURTHER CHARGES THAT:

In or about September 2004, in the Eastern District of Pennsylvania, defendant

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

knowingly threatened to engage in conduct to cause bodily injury to Juan Rosado, a person known to the grand jury, and to members of Juan Rosado’s family, with intent to retaliate against Juan Rosado for providing information relating to the commission and possible commission of a federal offense given by Juan Rosado to a law enforcement officer, that is, a Special Agent employed by the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 1513(b)(2).

COUNT EIGHTEEN

(Threatening to Retaliate Against a Witness)

THE GRAND JURY FURTHER CHARGES THAT:

In or about September 2004, in the Eastern District of Pennsylvania, defendant

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”**

knowingly threatened to engage in conduct to cause bodily injury to members of Stanley Smith’s family, with intent to retaliate against Stanley Smith for providing information relating to the commission and possible commission of a federal offense given by Stanley Smith to a law enforcement officer, that is, a Special Agent employed by the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 1513(b)(2).

COUNTS NINETEEN THROUGH TWENTY-FOUR

(Use of Telephone To Facilitate Drug Trafficking)

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, in the Eastern District of Pennsylvania, the defendants listed below knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to manufacture and distribute cocaine described in Count One of this indictment, in violation of Title 21, United States Code, Section 846, in that the defendants used the telephone to discuss, facilitate, and arrange cocaine transactions, including, but not limited to the possession, sale, distribution, and processing of cocaine.

Count	Date	Defendants
19	October 18, 2000	KABONI SAVAGE and GERALD THOMAS
20	December 12, 2000	KABONI SAVAGE and GERALD THOMAS
21	January 10, 2001	JAMES WALKER and GERALD THOMAS
22	January 19, 2001	JAMES WALKER and GERALD THOMAS
23	February 13, 2001	DEREK RUSSELL and GERALD THOMAS
24	February 21, 2001	DEREK RUSSELL and GERALD THOMAS

All in violation of Title 21, United States Code, Section 843(b).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 21, United States Code, Section 846, as set forth in Count One of this Indictment, and of Title 18, United States Code, Sections 1956(h), 1956(a)(1), and 1957, as set forth in Counts Two through Nine of this Indictment, defendants

**KABONI SAVAGE,
a/k/a “Yusef Billa,”
a/k/a “Joseph Amill,”
a/k/a “Bon,” “Bonnie,”
a/k/a “B,”
GERALD THOMAS,
a/k/a “Baha Jabbaar,”
a/k/a “Bubbie,”
STEVEN NORTHINGTON,
a/k/a “Michael Tillery,”
a/k/a “Syeed Burhannon,”
a/k/a “Darnell Doss,”
a/k/a “Kevin Lewis,”
a/k/a “Smoke,”
MELVIN STEIN,
JAMES WALKER,
a/k/a “Candy,”
and
DEREK RUSSELL,
a/k/a “Fly,”**

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982: (a) all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violations; (b) any of the defendants’ property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations; and (c) property involved in money laundering violations, or any property traceable to such property, including but not limited to the following:

1. \$5,000,000 in proceeds;
2. 9 Blue Grass Road, Clementon, New Jersey;
3. 450 East Vernon Road, Philadelphia, Pennsylvania;

4. 616 North 11th Street, Philadelphia, Pennsylvania;
5. 728 East Phil Ellena Street, Philadelphia, Pennsylvania;
6. 1546 East Upsal Street, Philadelphia, Pennsylvania;
7. 1732 Kendrick Street, Philadelphia, Pennsylvania;
8. 1805 East Tulpehocken Street, Philadelphia, Pennsylvania;
9. 2000 West Cheltenham Avenue, Philadelphia, Pennsylvania;
10. 6641 Lynford Street, Philadelphia, Pennsylvania;
11. 7507 Woolston Avenue, Philadelphia, Pennsylvania;
12. 7963 Fayette Street, Philadelphia, Pennsylvania;
13. 8563 Williams Avenue, Philadelphia, Pennsylvania;
14. 7502 Thouron Avenue, Philadelphia, Pennsylvania;
15. 3726 Percy Street, Philadelphia, Pennsylvania;
16. 1997 Dodge Sedan given as a gift on October 8, 2002, with title transferred from the false name "Baha Jabbaar" to C.S., a person known to the grand jury;
17. 1997 Mercury purchased on July 29, 1999, from Hopkins Ford, Inc., of Jenkintown, Pennsylvania, for \$19,495 and titled in the false name "Joseph Amill";
18. 1998 Ford Truck purchased on January 26, 2001, from Chapman Ford Sales, Inc., of Philadelphia, Pennsylvania, for \$20,135 and titled in the false name "Yusef M. Billa";
19. 2001 Chrysler Jeep purchased on September 12, 2001, from Triboro Motors, Inc., of Cinnaminson, New Jersey, for \$20,895 and titled in the false name "Yusef M. Billa";

20. 2002 Subaru purchased on March 30, 2002, from Wilkie Subaru of Philadelphia, Pennsylvania, for \$29,094 and titled in the false name “Yusef M. Billa”;
21. 1999 Pontiac Grand Prix purchased on December 29, 2003, from Carl H. & Ruth Auto Sales, Plymouth Meeting, Pennsylvania, for \$5,000 and titled in the false name “Syed Burhannon”;
22. Intertec AB-10 9mm automatic handgun with an obliterated serial number;
23. Davis Industries P-380 handgun (serial number AP503610);
24. Sig Sauer P225 9mm semi-automatic handgun (serial number M586419);
25. Ruger Redhawk .44 caliber semi-automatic handgun (serial number 502-15971);
26. .22 caliber North American Arms revolver (serial number V65268);
27. .22 caliber North American Arms revolver (serial number V00171);
28. Interarms .357 revolver (serial number F160919);
29. Strum/Ruger, Super Blackhawk, .44 caliber revolver (serial number 86-41043);
30. Ruger SP101 .357 revolver (serial number 571-08258).

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants,

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and

Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney
Eastern District of Pennsylvania